

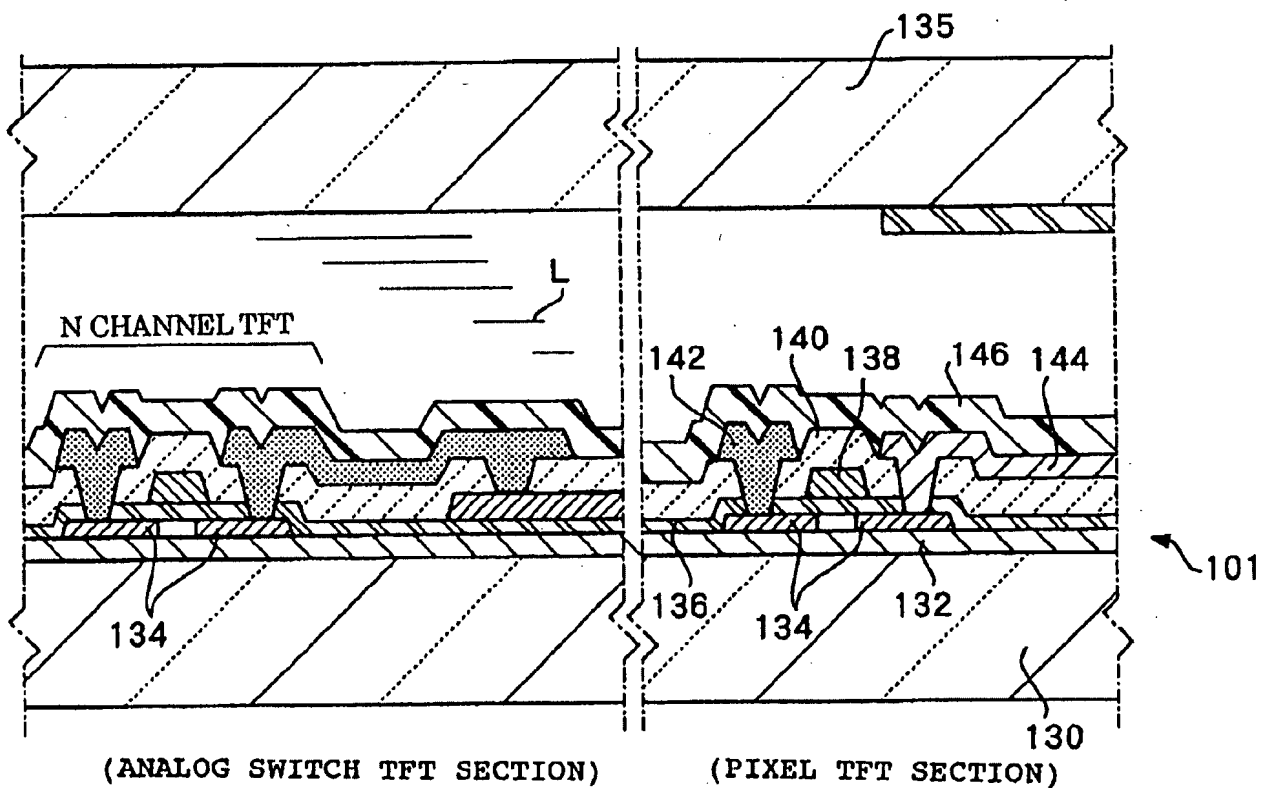
the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 1, 4, 5, 9, 13, 15, 17 and 20 as obvious based on the combination of U.S. Patent Publication No. 2001/0022644 to Hinata and U.S. Patent No. 6,300,152 to Kim. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claim 1 recites a display device covered and sealed with a resin between a first substrate and a second substrate. For the reasons provided below, Hinata and Kim, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action asserts that Hinata teaches that "the thin film integrated circuit and the display device are sealed [with a passivation layer 146] between the first substrate and the second substrate of the card [see figure 18, passivation layer 146]" (page 2, Paper No. 20070117). However, the Applicant respectfully submits that the passivation layer 146 of Hinata does not cover a display device (Figure 18 reproduced below).



In Hinata, the TFT in the pixel section described in paragraph 162 does not function by itself as a display device without at least a liquid crystal layer L over the passivation layer 146. That is, the passivation layer 146 is part of the display device itself and does not cover a display device. It is not appropriate to assert that the passivation layer 146 of Hinata corresponds with the resin of the present claims. Therefore, Hinata does not teach or suggest a display device covered and sealed with a resin between a first substrate and a second substrate.

Kim does not cure the deficiencies in Hinata. The Official Action relies on Kim to allegedly teach "acrylic resin used as a passivation layer" (page 2, Paper No. 20070117). However, Hinata and Kim, either alone or in combination, do not teach or suggest a display device covered and sealed with a resin between a first substrate and a second substrate.

Since Hinata and Kim do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

The Official Action rejects claims 2, 3 and 11 based on the combination of Hinata, Kim and U.S. Patent No. 4,709,991 to Hoshikawa, U.S. Patent No. 4,709,995 to Kuribayashi or U.S. Patent No. 6,859,195 to Kodate, respectively.

Hoshikawa, Kuribayashi and Kodate do not cure the deficiencies in Hinata and Kim. The Official Action relies on Hoshikawa, Kuribayashi and Kodate to allegedly teach the features of dependent claims 2, 3 and 11, respectively. Specifically, the Official Action relies on Hoshikawa to allegedly teach "the card having a thickness from 0.05 mm through 1.5 mm" (page 3, Paper No. 20070117), on Kuribayashi to allegedly teach "a passive matrix electrode structure" (*Id.*) and on Kodate to allegedly teach "the device being light emitting" (*Id.*). However, Hinata, Kim and Hoshikawa, Kuribayashi or Kodate, either alone or in combination, do not teach or suggest the following features or that Hinata and Kim should be modified to include any of the following features: a display device covered and sealed with a resin between a first substrate and a second substrate. Since Hinata, Kim and Hoshikawa, Kuribayashi or Kodate do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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